

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	4:23-CR-159
	:	
v.	:	(Chief Judge Brann)
	:	
JOSHUA TAYLOR	:	(Electronically Filed)

**MOTION SEEKING JUDICIAL APPROVAL
FOR DEFENDANT TO TRAVEL**

AND NOW comes the Defendant, Joshua Taylor, by his attorney, Christopher Opiel, Esq., and files the following Motion Seeking Judicial Approval for Defendant to Travel to Massachusetts from May 12, 2024 through May 16, 2024. In support thereof, it is averred as follows:

1. On June 13, 2023, Joshua Taylor was charged in an Indictment with: COUNT 1, conspiracy to knowingly, intentionally, and willfully unlawfully transport, transmit, and transfer in interstate commerce stolen goods, wares and merchandise, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud in violation of 18 U.S.C. § 371; and COUNT 4, unlawfully transport, transmit, and transfer in interstate commerce stolen goods, wares and merchandise, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud in violation of 18 U.S.C. §§ 2314 and 2. (Doc. 1).

2. On June 14, 2023, Defendant was arraigned on the charges, and he entered a plea of “not guilty”. (Doc. 12).

3. On June 14, 2023, Defendant was released from custody under pretrial supervision and an Order Setting Conditions of Release was filed to the docket. (Doc. 15).

4. Paragraph (7)(f) of the Order Setting Conditions of Release restricts the Defendant’s travel to the “Middle and Eastern Districts of PA unless otherwise approved by pretrial services officer”. (Doc. 15).

5. Defendant owns his own business in which he engages in the buying and selling of antiques.

6. Defendant is respectfully seeking judicial approval to travel outside the Middle and Eastern Districts of Pennsylvania in order to attend the Brimfield Antique Flea Market in Brimfield, Massachusetts from May 12, 2024 through May 16, 2024 for the purpose of his business.

7. Defendant will be staying at the Red Roof Plus hotel located at 1254 Riverdale Street, West Springfield, MA 01089; and he will be traveling daily to Brimfield, MA for the Brimfield Antique Flea Market.

8. On June 29, 2023, this Honorable Court entered an Order permitting Defendant to travel to Brimfield, MA for the Brimfield Antique Flea Market from July 9, 2023 through July 13, 2023. (Doc. 42).

9. On August 3, 2023, this Honorable Court entered an Order permitting Defendant to travel to Brimfield, MA for the Brimfield Antique Flea Market from September 3, 2023 through September 7, 2023. (Doc. 59).

10. Defendant complied with all terms and conditions imposed upon him by the Court and the United States Probation Office when he traveled outside the Middle and Eastern Districts of Pennsylvania from July 9, 2023 through July 13, 2023 and from September 3, 2023 through September 7, 2023.

11. Undersigned Counsel communicated with United States Probation Officer Jeffrey Reber regarding this motion and Mr. Reber indicated that the United States Probation Office does not have any objection to the travel arrangements requested in this motion.

12. Undersigned Counsel communicated with Assistant United States Attorney Sean A. Camoni regarding this motion and AUSA Camoni indicated that he does not have any objection to the travel arrangements requested in this motion.

WHEREFORE, the Defendant, Joshua Taylor, respectfully requests that this Honorable Court grant the within motion and enter an order approving the travel accommodations as stated within this motion.

Respectfully submitted,

Date: April 26, 2024

/s/ Christopher Opiel
Christopher Opiel, Esq.

CJA Appointed Counsel

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CERTIFICATE OF SERVICE

I, Christopher Opiel, CJA appointed counsel, do hereby certify that this document, the foregoing **Motion Seeking Judicial Approval for Defendant to Travel**, filed electronically through the ECF system will be sent to the registered Participants as identified on the Notice of Electronic Filing, including the following:

Sean A. Camoni, Esquire
Assistant United States Attorney

Date: April 26, 2024

/s/ Christopher Opiel

Christopher Opiel, Esq.